

Exhibit C-1

**Chart Demonstrating Relationship Between
the Ambac Rule 2004 Motion Requests and Discovery
Requests in Ambac Adversary Proceeding 17-00159**

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**Selected Examples: Relationship between
the Ambac Motion Rule 2004 Requests and
Discovery Requests in Ambac Adversary Proceeding (17-159)¹**

Request in Ambac Adversary Proceeding	Rule 2004 Request
No. 12: All Documents, communications, studies, and/or analyses concerning the February 28 Commonwealth Fiscal Plan.	<p>No. 1: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the development of the February 28 Fiscal Plan.</p> <p>No. 3: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the determination of which Commonwealth Instrumentalities would be covered by the Fiscal Plan.</p> <p>No. 4: Document[s] sufficient to identify the list of governmental agencies and Instrumentalities that were relied upon to source the information underlying the Fiscal Plan.</p> <p>No. 5: All documents, communications, studies, and/or analyses relating to what due diligence was undertaken with regard to the data underlying the Fiscal Plan.</p> <p>No. 6: All documents, communications, studies, and/or analyses that relate to the assertion that the Fiscal Plan is a “living document.” This Request includes, but is not limited to, documents that explain the methodologies for updating the Fiscal Plan to reflect new data and key developments, and the identities</p>

¹ The Ambac Motion [ECF No. 1283] seeks responses to 34 requests. This chart details the numerous instances where the Rule 2004 motion requests overlap with Ambac’s requests propounded in its adversary proceeding, *Ambac Assurance Corp v. Commonwealth of Puerto Rico*, Adv. Proc. No. 17-00159 (Bankr. D. P.R.) (the “159 Proceeding”).

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Request in Ambac Adversary Proceeding	Rule 2004 Request
	<p>of the people involved in such updates.</p> <p>No. 11: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the changes reflected in the Revised Fiscal Plan as set forth in the May 31 Letter.</p> <p>No. 12: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the development of the Budget.</p> <p>No. 22: Documents sufficient to identify the inflation assumptions utilized in the Fiscal Plan.</p> <p>No. 23: Documents sufficient to identify the impact of structural policy measures utilized in the Fiscal Plan.</p> <p>No. 27: All documents, communications, studies, and/or analyses concerning any actual or projected federal transfer allotted to Puerto Rico for use in its Medicaid program contained in the Fiscal Plan, including but not limited to the \$295.9 million allotment passed by Congress on or about May 1, 2017, and any potential allotment proposed by the President of the United States in the budget.</p> <p>No. 28: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the development of the Proposal.</p> <p>No. 29: All models or workbooks (in native format), including any backup or linked spreadsheets and any data run through such models or workbooks, prepared in connection with the development and/or analysis of the February 28 Fiscal Plan, the</p>

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Request in Ambac Adversary Proceeding	Rule 2004 Request
	<p>Fiscal Plan, the Revised Fiscal Plan, the Budget, and the Proposal.</p> <p>No. 30: All documents, communications, studies, and/or analyses prepared in relation to the economic model cited in the Oversight Board Annual Report with a 50-year long-term projection.</p> <p>No. 31: Documents sufficient to show the percentage of retirement system beneficiaries associated with the pension expenses in the Fiscal Plan that live off-island.</p> <p>No. 32: All documents and data You intend to use to support any plan of adjustment You may make in the above-captioned proceeding.</p>
No. 13: All documents, communications, studies, and/or analyses concerning the Commonwealth Fiscal Plan, including, but not limited to:	No. 2: All documents, communications, studies, and/or analyses prepared for or relied upon in connection with the development of the Fiscal Plan.
No. 13A: All Documents, communications, studies, and/or analyses that support the assertion, contained on page 2 of the April 25 Letter, that the Commonwealth “has cut <i>all</i> categories of expenses up to the point where its economist have determined that further material annual cuts for the foreseeable future would . . . prevent growth from reaching levels needed to ensure fiscal sustainability.”	No. 7: All documents, communications, studies, analyses, models, and/or workbooks (in native format) that support the assertion, contained on page 2 of the April 25 Letter, that the Oversight Board “has cut <i>all</i> categories of expenses up to the point where its economist have determined that further material annual cuts for the foreseeable future would . . . prevent growth from reaching levels needed to ensure fiscal sustainability.”
No. 13B: All Documents, communications, studies, and/or analyses that support the assertion, contained on page 9 of the April 25 Letter, that “additional shortterm cuts might produce slightly higher resources over the first 10 years, but never do over the longer 2018-60 period.”	No. 8: All documents, communications, studies, and/or analyses that support the assertion, contained on page 9 of the April 25 Letter, that “additional short-term cuts might produce slightly higher resources over the first 10 years, but never do over the longer 2018-60 period.”
No. 13C: All Documents, communications, studies, or analyses concerning the Oversight Board’s decision to reject the February 28 Commonwealth Fiscal Plan.	No. 9: All documents, communications, studies, and/or analyses concerning the Oversight Board’s decision to reject the February 28 Fiscal Plan.

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Request in Ambac Adversary Proceeding	Rule 2004 Request
No. 13D: All Documents, communications, studies, or analyses concerning the Oversight Board's decision to certify the Commonwealth Fiscal Plan.	No. 10: All documents, communications, studies, and/or analyses concerning the Oversight Board's decision to certify the Fiscal Plan.
No. 13E: Documents sufficient to identify the portion of annual expenses contained in the Commonwealth Fiscal Plan that are for essential services.	No. 13: Documents sufficient to identify the portion of annual expenses contained in the Fiscal Plan that are for essential services. No. 15: All documents, communications, studies, and/or analyses relied upon in connection with the determination of the estimated cost of essential services during the Fiscal Year 2017 to Fiscal Year 2026 period.
No. 13F: Documents sufficient to identify which government services are essential services and which government services are non-essential services.	No. 14: Documents sufficient to identify which government services are essential services and which government services are non-essential services.
No. 13G: All Documents, communications, studies, or analyses concerning the "Reconciliation Adjustment" described on page 14 of the Commonwealth Fiscal Plan.	No. 16: All documents, communications, studies, and/or analyses concerning the "Reconciliation Adjustment" described on page 15 of the Fiscal Plan.
No. 13H: All Documents, communications, studies, or analyses concerning the estimated payroll expenses contained in the Commonwealth Fiscal Plan.	No. 17: All documents, communications, studies, and/or analyses concerning the estimated payroll expenses contained in the Fiscal Plan.
No. 13I: All Documents, communications, studies, or analyses concerning the estimated operational expenses contained in the Commonwealth Fiscal Plan.	No. 18: All documents, communications, studies, and/or analyses concerning the estimated operational expenses contained in the Fiscal Plan.
No. 13J: All Documents, communications, studies, or analyses concerning the estimated component unit expenses contained in the Commonwealth Fiscal Plan.	No. 19: All documents, communications, studies, and/or analyses concerning the estimated component unit expenses contained in the Fiscal Plan.
No. 13K: Documents sufficient to identify the components of Gross National Product utilized in the Commonwealth Fiscal Plan.	No. 20: Documents sufficient to identify the components of Gross National Product utilized in the Fiscal Plan.
No. 13L: Documents sufficient to identify the fiscal multiplier utilized in the Commonwealth Fiscal Plan.	No. 21: Documents sufficient to identify the fiscal multiplier utilized in the Fiscal Plan.

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Request in Ambac Adversary Proceeding	Rule 2004 Request
No. 13M: All Documents, communications, studies, or analyses concerning the potential privatization of Commonwealth assets.	No. 24: All documents, communications, studies, and/or analyses concerning the potential privatization of Commonwealth assets. No. 25: Documents sufficient to show the aggregate book and market value of government and public enterprise-owned land and real estate and other marketable assets.
No. 13N: All Documents, communications, studies, or analyses concerning the estimated tax collection rates contained in the Commonwealth Fiscal Plan.	No. 26: All documents, communications, studies, and/or analyses concerning the estimated Sales and Use Tax collection rates contained in the Fiscal Plan.